

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCE SE,)	
)	
Plaintiff,)	
)	Case No. CIV-22-00702-JD
vs.)	Judge Jodi W. Dishman
)	
2. FREDY VALLE d/b/a VALLE)	
TRUCKING;)	
3. SILVER STAR CONSTRUCTION)	
COMPANY, INC.;)	
4. TYLON MACKEY;)	
5. ISRAEL JUAREZ; 5:22-CV-00702-JD)	
6. ORD TRUCKING, INC.)	
7. ZURICH AMERICAN INS. CO.,)	
)	
Defendants,)	
)	
<hr style="width: 45%; margin-left: 0;"/>		
8. ZURICH AMERICAN INS. CO.,)	
)	
Defendant/Third Party)	
Plaintiff,)	
)	
vs.)	
)	
9. PROGRESSIVE NORTHERN INS.)	
CO.,)	
)	
Third-Party Defendant.)	

**DEFENDANT/THIRD-PARTY PLAINTIFF ZURICH AMERICAN INSURANCE
COMPANY'S FINAL EXHIBIT LIST**

Defendant/Third-Party Plaintiff Zurich American Insurance Company (“**ZAIC**”), pursuant to the Court’s Scheduling Order (Doc. No. 56), respectfully submits its Final Exhibit List.

Exhibits

No.	Description	Will be used/May be used
1.	Accident Report for Underlying Accident (ZAIC_00001-ZAIC_000012)	May be used
2.	7/20/07 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000013)	May be used
3.	10/4/07 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000014)	May be used
4.	10/22/08 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000015)	May be used
5.	5/7/09 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000016)	May be used
6.	5/12/09 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000017)	May be used
7.	7/9/10 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000018)	May be used
8.	8/17/10 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000019)	May be used
9.	9/14/10 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000020)	May be used
10.	9/15/10 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000021)	May be used
11.	10/5/10 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000022)	May be used
12.	1/14/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000023)	May be used
13.	1/14/11 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000024)	May be used

14.	1/26/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000025)	May be used
15.	4/12/11 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000026)	May be used
16.	5/18/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000027)	May be used
17.	5/19/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000028)	May be used
18.	8/16/11 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000029)	May be used
19.	11/7/12 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000030)	May be used
20.	1/6/15 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000031)	May be used
21.	3/12/14 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000032)	May be used
22.	2/20/15 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000033)	May be used
23.	10/29/15 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000034)	May be used
24.	10/19/15 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000035)	May be used
25.	1/26/16 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000036)	May be used
26.	2/22/16 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000037)	May be used
27.	4/25/16 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000038)	May be used

28.	10/5/16 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000039)	May be used
29.	6/1/17 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000040)	May be used
30.	4/24/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 9/7/17 (ZAIC_000041)	Will be used
31.	11/20/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 11/15/18 (ZAIC_000042)	Will be used
32.	6/1/17 Oklahoma Corporation Commission Form K, Valle Trucking, Progressive Northern Insurance Company, coverage cancelled effective 1/11/19 (ZAIC_000043)	Will be used
33.	12/10/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 1/11/19 (ZAIC_000044)	Will be used
34.	12/18/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 12/18/18 (ZAIC_000045)	Will be used
35.	12/5/19 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 7/12/19 (ZAIC_000046)	Will be used
36.	3/15/13 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 3/7/13 (ZAIC_000047)	May be used
37.	5/4/15 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/27/15 (ZAIC_000048)	May be used
38.	4/30/15 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/30/15 (ZAIC_000049)	May be used
39.	5/17/16 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 5/17/16 (ZAIC_000050)	May be used
40.	11/27/18 Oklahoma Corporation Commission Form E, Ord Trucking, Shelter General Insurance Company, coverage effective from 10/29/18 (ZAIC_000051)	May be used

41.	9/2/20 Oklahoma Corporation Commission Form K, Ord Trucking, Shelter General Insurance Company, coverage cancelled effective 11/7/20 (ZAIC_000052)	May be used
42.	10/20/20 Oklahoma Corporation Commission Form E, Ord Trucking, Progressive Northern Insurance Company, coverage effective from 11/7/20 (ZAIC_000053)	Will be used
43.	7/20/07 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company, coverage effective from 7/19/07 (ZAIC_000054)	May be used
44.	10/4/07 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company, coverage cancelled effective 10/25/07 (ZAIC_000055)	May be used
45.	10/22/08 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 3/17/08 (ZAIC_000056)	May be used
46.	5/7/09 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 6/11/09 (ZAIC_000057)	May be used
47.	5/12/09 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 5/11/09 (ZAIC_000058)	May be used
48.	7/8/10 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 8/12/10 (ZAIC_000059)	May be used
49.	8/17/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/17/10 (ZAIC_000060)	May be used
50.	9/13/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 10/15/10 (ZAIC_000061)	May be used
51.	9/15/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 10/15/10 (ZAIC_000062)	May be used
52.	10/5/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 11/5/10 (ZAIC_000063)	May be used

53.	1/14/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 11/24/10 (ZAIC_000064)	May be used
54.	12/30/10 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000065)	May be used
55.	1/26/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 1/20/11 (ZAIC_000066)	May be used
56.	4/12/11 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 5/16/11 (ZAIC_000067)	May be used
57.	5/18/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/11 (ZAIC_000068)	May be used
58.	5/19/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/11 (ZAIC_000069)	May be used
59.	8/16/11 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 9/15/11 (ZAIC_000070)	May be used
60.	11/17/12 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 11/6/12 (ZAIC_000071)	May be used
61.	1/16/15 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 2/16/15 (ZAIC_000072)	May be used
62.	3/12/14 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/18/14 (ZAIC_000073)	May be used
63.	2/20/15 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/16/15 (ZAIC_000074)	May be used
64.	10/29/15 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 10/26/15 (ZAIC_000075)	May be used

65.	10/19/15 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 11/16/15 (ZAIC_000076)	May be used
66.	1/26/16 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/26/16 (ZAIC_000077)	May be used
67.	2/22/16 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/16 (ZAIC_000078)	May be used
68.	4/25/16 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/16 (ZAIC_000079)	May be used
69.	10/5/16 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/25/16 (ZAIC_000080)	May be used
70.	6/1/17 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 7/5/17 (ZAIC_000081)	May be used
71.	4/24/18 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 9/7/17 (ZAIC_000082)	May be used
72.	11/20/18 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 11/15/18 (ZAIC_000083)	Will be used
73.	12/7/18 Oklahoma Corporation Commission Form K, Fredy Valle, Progressive Northern Insurance Company, coverage cancelled effective 1/11/19 (ZAIC_000084)	Will be used
74.	12/10/18 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 1/11/19 (ZAIC_000085)	Will be used
75.	12/18/18 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 12/18/18 (ZAIC_000086)	Will be used
76.	12/5/19 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 7/12/19 (ZAIC_000087)	Will be used

77.	Certified copy of ZAIC policy No. BAP 9809603-04 issued to Silver Star Construction, effective dates 04/01/19-04/01/20 (ZAIC_000088-ZAIC_000156)	Will be used
78.	07/8/20 Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000157-ZAIC_000163)	May be used
79.	9/16/20 Answer of ORD Trucking filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000164-ZAIC_000170)	May be used
80.	1/22/21 Answer of Defendant Israel Juarez filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000171-ZAIC_000176)	May be used
81.	4/8/21 Plaintiff's First Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000177-ZAIC_000183)	May be used
82.	7/29/21 Transcript of Deposition of Israel Juarez (ZAIC_000184-ZAIC_000272)	May be used
83.	08/10/21 Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000273-ZAIC_000277)	May be used
84.	9/7/21 Combined Answer of Israel Juarez to Plaintiff's Petition, Plaintiff's First Amended Petition, and Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000278-ZAIC_000282)	May be used
85.	9/7/21 Defendant ORD Trucking's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000283-ZAIC_000291)	May be used
86.	9/27/21 Defendant Silver Star Construction Company's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000292-ZAIC_000304)	May be used
87.	5/2/22 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000305-ZAIC_000311)	May be used
88.	Defendant Silver Star Construction Company's Answers to Plaintiff's First Set of Interrogatories (ZAIC_000312-ZAIC_000334)	May be used

89.	Defendant Silver Star Construction Company's Responses to Plaintiff's First Request for Admission (ZAIC_000335-ZAIC_000341)	May be used
90.	Defendant Silver Star Construction Company's Answers to Plaintiff's First Requests for Production (ZAIC_000342-ZAIC_000372)	May be used
91.	Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking Responses to Plaintiff's First Set of Discovery Request (ZAIC_000373-ZAIC_000391)	May be used
92.	7/15/22 Defendant Silver Star Construction Company's Amended Answer to Plaintiff's Second Amended Petition and Cross-Claims against Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking (ZAIC_000392-ZAIC_000422)	May be used
93.	8/8/22 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Cross-Claim of Silver Star Construction (ZAIC_000423-ZAIC_000427)	May be used
94.	2/7/19 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000428-ZAIC_000435) (duplicate of No. 106)	Will not use (duplicate)
95.	2/8/19 Certificate of Liability Insurance, Berkshire Hathaway Homestate Ins. Co. to Fredy N. Valle, Sr. d/b/a Valle Trucking listing Silver Star Construction and its Subsidiaries as an additional insured (ZAIC_000436-ZAIC_000437)	Will be used
96.	Uncertified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/19 to 2/11/20 (ZAIC_000438-ZAIC_000472)	May be used
97.	Certified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/19 to 2/11/20	Will be used
98.	2/12/19 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000473)	Will be used
99.	2/20/19 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000474)	Will be used

100.	9/5/19 Certificate of Liability Insurance, Progressive Northern Insurance Company to Fredy Valle, Valle Trucking listing Silver Star Construction and its Subsidiaries as Certificate Holder (ZAIC_000475)	Will be used
101.	9/27/21 Letter from ZAIC to Fredy Valle demanding Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_000476-ZAIC_000478)	Will be used
102.	11/15/21 Email from J. Chris Horton to Valletrucking51@yahoo.com re: attaching filings from underlying lawsuit and Demand from ZAIC to Valle Trucking (ZAIC_000479-ZAIC_480)	May be used
103.	4/8/21 Plaintiff's First Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000481-ZAIC_000487) (duplicate of No. 81)	Will not use (duplicate)
104.	8/10/21 Plaintiff's Second Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000488-ZAIC_000494) (duplicate of No. 83)	Will not use (duplicate)
105.	5/20/21 Certificate of Service by Mail filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000495-ZAIC_000498)	May be used
106.	11/15/21 Letter from ZAIC to Fredy Valle re: demand that Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_0000499-ZAIC_000501)	Will be used
107.	2/7/19 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000502-ZAIC_000509)	Will be used
108.	5/17/22 Letter from ZAIC to Great Lakes Insurance SE demanding Great Lakes to defend and indemnify Silver Star Construction Company (ZAIC_000510-ZAIC_000512)	Will be used
109.	5/17/22 Letter from ZAIC to Progressive Northern Insurance Company demanding Progressive to defend and indemnify Silver Star Construction Company (ZAIC_000513-ZAIC_000515)	Will be used
110.	5/17/22 Letter from ZAIC to Berkshire Hathaway Homestate Ins. Co. demanding Berkshire Hathaway to defend and indemnify Silver Star Construction Company (ZAIC_000516-ZAIC_000518)	Will be used
111.	5/25/22 Letter from Chris Horton to Jeffrey Curran, counsel for Fredy Valle d/b/a Valle Trucking, re: demand that Valle	Will be used

	Trucking defend and indemnify Silver Star Construction Company (ZAIC_000519-ZAIC_000522)	
112.	6/20/22 Letter from Berkshire Hathaway to ZAIC re: declining to accept tender (ZAIC_000523)-ZAIC_000524)	May be used
113.	8/9/22 Letter from International Programs Group to Silver Star Construction Company, Chris Horton, and ZAIC re: Notice of Reservation of Rights (ZAIC_000525-ZAIC_000535)	Will be used
114.	Correspondence from Progressive to Shelter Insurance dated 2/7/23	May be used
115.	Correspondence from Silver Star's counsel to Progressive dated 9/19/22	May be used
116.	Correspondence from Progressive to Valle Trucking dated 2/7/23	May be used
117.	Correspondence from Progressive to Valle Trucking dated 2/8/23	May be used
118.	4/4/22 Great Lakes' Notice of Reservation of Rights to Valle Trucking	May be used
119.	5/25/22 Letter from J. Chris Horton to Jeffrey A. Curran re: demand for defense and indemnity of Silver Star in the litigation	May be used
120.	11/15/21 Email from Chris Horton to Valle Trucking's Mr. Monge re: asking him to provide the lawsuit and ZAIC's letter to his insurance company.	May be used
121.	2/8/19 Fax from Wanadaly Cruz, licensed insurance producer, to Great Lakes with Certificate of Insurance listing Berkshire as insurer	May be used
122.	9/4/19 Official Oklahoma Traffic Collision Report	May be used
123.	8/10/21 Summons to Silver Star with Plaintiff's Second Amended Petition	May be used
124.	8/8/22 Notice of Reservation of Rights to Silver Star and Chris Horton from International Programs Group	May be used
125.	2/10/22 Email from Kenneth A. Shaw at Richey Ins to j.f.thill@jplush.com (John) re: Got this memo today. Please review.	May be used

	<ul style="list-style-type: none"> Includes forwarded 2/10/22 email from Casey Ryan at ZAIC to Richey Ins re; reporting claim for claimant Tylon Mackey for date of loss 9/4/2019, with attachments. 	
126.	2/17/22 International Programs Group Letter to Valle Trucking re: reviewing the lawsuit and will advise regarding his request for defense and indemnity. Acknowledges Valle not yet been served, recommends he contact his attorney to protect his interests.	May be used
127.	10/4/21 Letter from ZAIC to Fredy Valle re: demanding defense and indemnity by Valle for Silver Star	May be used
128.	<p>2/14/22 Email from John Thill to Terri Singleton re: the application we have shows the contact person as Freddy Napoleon Valle Arana and the phone number 405-501-8005</p> <ul style="list-style-type: none"> Includes 2/14/23 email from Terri Singleton to Mr. Shaw re: claim assigned to me for handling. Includes 2/11/22 email from j.f.thill@jplush.com to IPG Claims New Loss Notification, 	May be used
129.	<p>2/11/22 Email from Jessica Christopher to Samantha Porbeck, IPG Claims New Loss Notification, and Terri Singleton re: Set up as 77889</p> <ul style="list-style-type: none"> Includes 2/11/22 email from Samantha Porbeck to IPG Claims New Loss Notification re: Please assign to Terri. 	May be used
130.	2/15/22 Email from Terri Singleton to newclaims@eandsclaims.com re: ZAIC is requesting defense for the lawsuit due to the Hauling Service Agreement.	May be used
131.	7/29/21 Video Deposition of Israel Juarez	May be used
132.	2/15/22-2/16/22 Claim notes of Great Lakes	May be used
133.	All pleadings, motions, and orders filed in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
134.	All discovery exchanged in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used

135.	All discovery exchanged in the instant action	May be used
136.	Transcripts of all depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
137.	Transcripts of all depositions taken in the instant action	May be used
138.	Expert reports of all experts identified by any party to this action	May be used
139.	Expert reports of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
140.	Expert CVs of all experts identified by any party to this action	May be used
141.	Expert CVs of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
142.	Expert invoices for time spent by all experts identified by any party to this action	May be used
143.	Expert invoices for all time spent by all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
144.	Expert prior testimony history for all experts identified by any party to this action	May be used
145.	Expert prior testimony history for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
146.	Expert publications for all experts identified by any party to this action	May be used
147.	Expert publications for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
148.	All documents exchanged by Progressive with its Initial Disclosures in this action unless otherwise objected to by ZAIC	May be used
149.	All documents exchanged by Great Lakes with its Initial Disclosures in this action unless otherwise objected to by ZAIC	May be used

150.	All documents exchanged by ZAIC with its Initial Disclosures in this action unless otherwise objected to by ZAIC	May be used
151.	All documents produced in response to Subpoenas in this action	May be used
152.	All documents produced in response to Subpoenas in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
153.	All documents exchanged in discovery in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
154.	All documents exchanged in discovery in the instant action unless otherwise objected to by ZAIC	May be used
155.	All deposition exhibits of depositions taken in this action unless otherwise objected to by ZAIC	May be used
156.	All deposition exhibits of depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by ZAIC	May be used
157.	All verified discovery responses from this action unless otherwise objected to by ZAIC	May be used
158.	All verified discovery responses in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by ZAIC	May be used
159.	Plaintiff's Answers to ZAIC's Interrogatories	May be used
160.	Progressive's Answers to ZAIC's Interrogatories	May be used
161.	Plaintiff's Responses to ZAIC's Requests for Production	May be used
162.	Progressive's Responses to ZAIC's Requests for Production	May be used
163.	Progressive's Responses to ZAIC's Requests for Admission	May be used
164.	Exhibits identified in Great Lakes' responses to ZAIC's discovery requests.	May be used
165.	Exhibits identified in Progressive's responses to ZAIC's discovery requests.	May be used
166.	Exhibits identified by ongoing discovery in this action.	May be used

167.	Exhibits identified by ongoing discovery in the underlying action.	May be used
168.	All exhibits listed by Plaintiff in this case not otherwise objected to by ZAIC	May be used
169.	All exhibits listed by Progressive in this case not otherwise objected to by ZAIC	May be used
170.	Affidavits or other documents needed for the identification and authentication of records.	May be used
171.	All materials considered or relied upon by experts in forming their opinions	May be used
172.	All exhibits necessary for rebuttal or impeachment	May be used
173.	Any exhibits identified as discovery progresses in this matter	May be used

Respectfully Submitted,

ASTON | MATHIS | CAMPBELL PLLC

By s/Amy E. Hampton

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Attorney for Plaintiff Zurich American
Insurance Company

CERTIFICATE OF SERVICE

I, Amy E. Hampton, hereby certify that on this 19th day of September, 2023, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system:

Michael S. Linscott
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